

Topic	Point of Contact	State/Region/HQ	Discussed in previous IR Memo (Y/N)	Problem Statement	Proposed Recommendation	Topic already identified for inclusion in IR memo because related to 303(d) Program Vision (Y/N/NA)
Antidegradation	Ruth Chemerys/ Aaron Larson	HQ/Wisconsin	Y - 2014 provided guidance on Tier 3 Outstanding Natural Resource Waters	WDNR: considering possible assessment method updates that could address antidegradation provisions for WQS by identifying declining water quality trends or "threatened" waters	Ex. 5 - Deliberative WDNR: EPA should continue to work with states and other stakeholders to develop more specific guidance on how best to monitor and assess waters to determine whether antidegradation requirements have been attained	NA
Assessment determinations based on small datasets using the 2012 Recreational Water Quality Criteria (RWQC) for Fecal Indicator Bacteria (FIB)	Jim Keating	HQ	Y - In 2006 IRG, in the context of data quality, quantity, and representativeness	Ex. 5 - Deliberative	Ex. 5 - Deliberative	NA
Update of the Variable Portion of the Section 106 Allocation Formula	Robyn Delehanty	HQ	N	Ex. 5 - Deliberative	Ex. 5 - Deliberative	NA
Timely submittal and review of IRs	Kathy Stecker	North Carolina	Y - In the 2012 and 2014 memo, discuss importance of timely submittals with reference to approvals	Are we able to show improvement in EPA review times?	Showing improvements in EPA review times would be a good leading statement	NA
ATTAINS	Tom Stiles/Lynette Guevara	Kansas/New Mexico	Yes - but not related to current ATTAINS redesign discussions/changes	ATTAINS Redesign changes	Discuss forthcoming updates related to 2016 IR	
Georeferencing Tier 2 and Tier 3 Waters	Dwight Atkinson	HQ	N	Ex. 5 - Deliberative	Ex. 5 - Deliberative	NA
Identifying 303(d) Program Vision Prioritization	Tom Stiles/Jason Sutter	Kansas/Arizona	N	303(d) Program Vision related: 303(d) Program Vision calls for states to report on their prioritization and protection activities; however, existing guidance does not specify EPA's expectations	Address as suggested by the 303(d) Program Vision milestones. Jason: EPA to provide clear expectations for states on minimum requirements for including elements of the new vision in the IR. In addition to protection and prioritization does EPA expect states to include a summary of integration efforts in the 2016 IR	Y

Identifying 303(d) Program Vision Protection priorities	Identifying 303(d) Program Vision Protection priorities	Tom Stiles/Jason Sutter/Aaron Larson	Kansas/Arizona/Wisconsin	N	303(d) Program Vision related: 303(d) Program Vision calls for states to report on their prioritization and protection activities; however, existing guidance does not specify EPA's expectations
Consideration of alternatives to TMDLs and how to account for them in the IR	Consideration of alternatives to TMDLs and how to account for them in the IR	Tom Stiles/Aaron Larson	Kansas/Wisconsin	N	303(d) Program Vision related
Guidance for listing impaired waters where a TMDL would not be effective	Guidance for listing impaired waters where a TMDL would not be effective	Jeff Myers	New York	N	IR categories do not make allowances for impaired waters where TMDL development is possible, but likely to be ineffective. Where TMDL development would be an ineffective use of resources and the state has no intention of developing TMDLs, labeling such waters as low priority is misleading to the public
Populating the WQ-27 database	Populating the WQ-27 database	Tom Stiles	Kansas	N	303(d) Program Vision and measures related
Use of Continuous Monitoring Data for 303(d) Listings	Use of Continuous Monitoring Data for 303(d) Listings	Bill Richardson	Region 3	N	<div>Ex. 5 - Deliberative</div>

Ensuring national consistency in the use of shellfish growing area classifications in determining attainment of water quality standards	Ensuring national consistency in the use of shellfish growing area classifications in determining attainment of water quality standards	Andrea Zimmer	Region 4	Y; plus Grubbs 2000 memorandum	Ex. 5 - Deliberative
Use of the 10% rule for determining the allowable exceedance frequency of water quality standards (WQS) or impaired waters listing thresholds	Use of the 10% rule for determining the allowable exceedance frequency of water quality standards (WQS) or impaired waters listing thresholds	Aaron Larson	Wisconsin	Y - 2006 IRG; however, WDNR indicated not aware of existing IR guidance	WDNR uses the 10% rule for determining the allowable exceedance rate of water quality criteria or listing thresholds excursions for several conventional water quality indicators (e.g., DO, temperature, and pH). Region 5 indicated that EPA is currently re-evaluating its guidance on the 10% exceedance rate and plans to explain it further in the 2016 IR and beyond. EPA's 2012 Rec Criteria recommends a 10% frequency exceedance when applying the Statistical Threshold Value regardless of sample size
Utilizing web links and referencing other documents in the IR narrative report	Utilizing web links and referencing other documents in the IR narrative report	Miranda Nichols	Minnesota	Y - 2006 IRG	2006 IRG says that States should provide a "description" on a variety of topics. MPCA has most of this information online. MPCA includes hyperlinks to "additional information" and have never been told not to, so it is unclear if these links are used or generally accepted
Total Waters Tables in IR narrative report	Total Waters Tables in IR narrative report	Miranda Nichols	Minnesota	Y - 2006 IRG	2006 IRG says that States should provide a table (see write-up), which MPCA does every two years. Then someone from EPA goes to the state ADB and recreates the number in order to check them in the state narrative. When both EPA and MPCA rely on the ADB for these numbers why is the production of these static tables necessary, when they can get out of sync? From MPCA's perspective, they have fulfilled the reporting requirements when they submit the ADB and GIS information. When asked about not having to recreate these numbers, Region 5 indicated that these were the only things they looked at in the Report
Clarification on required vs recommended reporting elements	Clarification on required vs recommended reporting elements	Miranda Nichols	Minnesota	Y - 2006 IRG	MPCA has attempted, since 2004, to provide all elements; however, when asked about dropping some recommended elements from the Narrative Report, Region 5's response sounded like everything was required.
Clarification on requirement to report on methods used to mitigate acidity in lakes	Clarification on requirement to report on methods used to mitigate acidity in lakes	Miranda Nichols	Minnesota	Y - 2006 IRG	The 2006 IRG points out that CWA Section 314 requires states to report on methods used to mitigate high acidity in lakes. Not exactly sure what this is.

How states IR narrative reports are used	How states IR narrative reports are used	Miranda Nichols	Minnesota	N	Why is this document created and why is it important. The 2006 IRG is helpful in mapping the section requirements. It appears that this document generally goes unread or at least underused, which makes it difficult to be motivated to produce a high quality report
Accurately Capturing Impairments Due to Hydrologic Alteration in Monitoring and Assessment Decisions and Reporting (see also Category 4c Topic submitted by California)	Accurately Capturing Impairments Due to Hydrologic Alteration in Monitoring and Assessment Decisions and Reporting (see also Category 4c Topic submitted by California)	Joanne Benante	Region 4	Y - 2002, 2004, and 2006 IRG, as well as Guidelines for Preparation of the Comprehensive State Water Quality Assessments and Electronic Updates (1997)	<div>Ex. 5 - Deliberative</div>

Category 4C (see also Hydrologic Alteration Topic submitted by Region 4)	Category 4C (see also Hydrologic Alteration Topic submitted by Region 4)	Nick Martorano/ Lynette Guevara	California/New Mexico	Y - 2006 IRG	(CA) The 2006 IRG is unclear on the correct application of Category 4C. The guidance defines Category 4C as a use being impaired, but the impairment is not caused by a pollutant. Current language could be interpreted to mean that waterbody segments only affected by pollution should be included in Category 4C. There is also lack of guidance on how to approach potential flow related impairments with the 303(d)/305(b) framework, and if it is appropriate to do so with a lack of adequate criteria and consistent historical flow data (NM) states need guidance on 1) tools/techniques/strategies to determine post CWA reductions in flow due to man-made activities, and 2) how the CWA agricultural exemption relates to Integrated List determinations.
Information on ways and appropriateness of assessing storm water	Information on ways and appropriateness of assessing storm water	Lynette Guevara	New Mexico	N	Both stakeholders and staff often question whether or not there are circumstances when storm water data should not be included in a particular assessment dataset.
303(d) program vision topics to be discussed in 2016 IR	303(d) program vision topics to be discussed in 2016 IR	Menchu Martinez	HQ	N	

Discuss or clarify further EPA expectations on minimum priorities and interim targets leading up to 2022	Discuss or clarify further EPA expectations on minimum priorities and interim targets leading up to 2022	Menchu Martinez	HQ	N	
EPA's role regarding state priorities versus EPA's approval of 303(d) list of impaired waters	EPA's role regarding state priorities versus EPA's approval of 303(d) list of impaired waters	Menchu Martinez	HQ	N	
Clarify that priority setting should not be based solely or predominately to revise old TMDLs or to remove potentially incorrect listings	Clarify that priority setting should not be based solely or predominately to revise old TMDLs or to remove potentially incorrect listings	Menchu Martinez	HQ	N	
Clarify where priorities/prioritization process should be documented; Clarify that rationale/supporting information should be included	Clarify where priorities/prioritization process should be documented; Clarify that rationale/supporting information should be included	Menchu Martinez	HQ	N	
Discuss "alternatives" - define - factors to aid in selection of TMDLs vs. non-TMDL alternative plan	Discuss "alternatives" - define - factors to aid in selection of TMDLs vs. non-TMDL alternative plan	Menchu Martinez	HQ	N	
Discuss "protection" - define	Discuss "protection" - define	Menchu Martinez	HQ	N	
Clarify how much engagement of the public is expected for the prioritization process	Clarify how much engagement of the public is expected for the prioritization process	Menchu Martinez	HQ	N	
Increased focus on assessment goal by more coordination with monitoring program	Increased focus on assessment goal by more coordination with monitoring program	Menchu Martinez	HQ	N	

Topic	Proposed Recommendation	Topic already identified for inclusion in IR memo because related to 303(d) Program Vision (Y/N/NA)	Topic already identified for inclusion in new 303(d) Program Measures computational guidance(Y/N/NA)	Topic selected for inclusion in the 2016 IR memo (Y/N)	Topic selected for inclusion in the 2018 IR memo (Y/N)	Comments
Antidegradation	<p>Ex. 5 - Deliberative</p> <p>WDNR: EPA should continue to work with states and other stakeholders to develop more specific guidance on how best to monitor and assess waters to determine whether antidegradation requirements have been attained</p>	NA	NA			Ex. 5 - Deliberative
Assessment determinations based on small datasets using the 2012 Recreational Water Quality Criteria (RWQC) for Fecal Indicator Bacteria (FIB)	Ex. 5 - Deliberative	NA	NA			
Update of the Variable Portion of the Section 106 Allocation Formula	Ex. 5 - Deliberative	NA	NA			
Timely submittal and review of IRs	Showing improvements in EPA review times would be a good leading statement	NA	NA			
ATTAINS	Discuss forthcoming updates related to 2016 IR					
Georeferencing Tier 2 and Tier 3 Waters	Ex. 5 - Deliberative	NA	NA			
Identifying 303(d) Program Vision Prioritization	<p>Address as suggested by the 303(d) Program Vision milestones.</p> <p>Jason: EPA to provide clear expectations for states on minimum requirements for including elements of the new vision in the IR. In addition to protection and prioritization does EPA expect states to include a summary of integration efforts in the 2016 IR</p>	Y	Y - as it relates to calculating the measure			

Identifying 303(d) Program Vision Protection priorities	<p>Address as suggested by the 303(d) Program Vision milestones.</p> <p>Jason: EPA to provide clear expectations for states on minimum requirements for including elements of the new vision in the IR. In addition to protection and prioritization does EPA expect states to include a summary of integration efforts in the 2016 IR</p> <p>Aaron: Provide a description of the types of protection plans that are acceptable for addressing impaired waters, in lieu of TMDLs, and that can be counted towards the new measures</p>	Y	Y - as it relates to calculating the measure			
Consideration of alternatives to TMDLs and how to account for them in the IR	<p>Address as suggested by the 303(d) Program Vision milestones</p> <p>Aaron: Factors to consider in determining whether TMDLs or alternative restoration approaches (non-category 4B alternatives) are best suited to address impaired waters listings. Provide a description of the types of restoration plans that are acceptable for addressing impaired waters, in lieu of TMDLs, and that can be counted towards the new measures. Provide clarification on the expected timeframes and need for completing TMDLs when alternative restoration plans are developed for impaired waters</p>	Y	Y - as it relates to calculating the measure			
Guidance for listing impaired waters where a TMDL would not be effective	Consider an additional sub-category under Category 4 for impaired waters where a TMDL is not appropriate	Y - alternatives	NA			
Populating the WQ-27 database	Address as suggested by the 303(d) Program Vision milestones	Y - as it relates to tracking necessary data in ATTAINS to automate the calculation of the measure	Y - discussion on universe, baseline, and targets			
Use of Continuous Monitoring Data for 303(d) Listings	Ex. 5 - Deliberative	NA	NA			

Ensuring national consistency in the use of shellfish growing area classifications in determining attainment of water quality standards	Ex. 5 - Deliberative	NA	NA			
Use of the 10% rule for determining the allowable exceedance frequency of water quality standards (WQS) or impaired waters listing thresholds	Requests clarification on the use of the 10% rule for other criteria including daily maximum criteria that are expressed in WQS as not to be exceeded.	NA	NA			
Utilizing web links and referencing other documents in the IR narrative report	Allow for states to forgo a description of a topic when it is found in other documents or on a webpage and provide a hyperlink instead	NA	NA			
Total Waters Tables in IR narrative report	Recommend that states not need to provide these tables. If this is not feasible, then explain why these are important in the narrative IR	NA	NA			
Clarification on required vs recommended reporting elements	Updated guidance to clarify what is required vs what is recommended and who makes that decision (HQ or Region) would be helpful	NA	NA			
Clarification on requirement to report on methods used to mitigate acidity in lakes	Update guidance on this requirement	NA	NA			

How states IR narrative reports are used	Information on how these reports are used after they are submitted. Knowing that these reports are actually looked at vs more than checking off the requirement would be useful	NA	NA			
Accurately Capturing Impairments Due to Hydrologic Alteration in Monitoring and Assessment Decisions and Reporting (see also Category 4c Topic submitted by California)	<div>Ex. 5 - Deliberative</div>	NA	NA			See California submittal

Category 4C (see also Hydrologic Alteration Topic submitted by Region 4)	<p>California:</p> <ol style="list-style-type: none"> 1) clarify EPA's expectation of states to list for flow impairment when the source is not caused by a pollutant 2) Explain the function of placement in Category 4C 3) Provide guidance on whether placement in Category 4C is exclusive (see example in write-up) 4) Provide a discussion of the scientific and technical rationale to justify placement of a flow-impaired water in Category 4C <p>New Mexico</p> <p>Include guidance on the following:</p> <ol style="list-style-type: none"> 1) tools/techniques/strategies to determine post CWA reductions in flow due to man-made activities 2) how the CWA agricultural exemption relates to Integrated List determinations. 3) Give state examples. 4) Provide RStudio scripts and procedures to download continuous USGS gage data and use this data to determine flow trends. 5) provide additional information on EPA's distinction between "pollutant" and "pollution", and a clear list of the most important causes of "pollution" that EPA would like to see a state monitor, assess, and report on. 	NA	NA			See Region 4 submittal on hydrologic alterations
Information on ways and appropriateness of assessing storm water	<p>Include guidance on the following:</p> <ol style="list-style-type: none"> 1) which water quality criteria are appropriate to assess against storm water data (ex, acute) and which are not (ex, chronic) based on how EPA's recommended WQ criteria were developed (i.e., based on short-term exposure, long-term exposure, life time exposure, etc.), 2) tools/techniques/strategies to determine what constitutes a "storm event" with respect to comparison against acute vs. chronic ALU criteria. Include a discussion on the relationship between a particular state's WQ standards and assessment (for example, if a state's WQ standards don't explicitly state that WQC were developed based on life time exposure but it is stated in the EPA WQ standards guidance, is this justification to not use storm water data for assessment?). 3) clarify whether or not storm water data should be used to assess against human health criteria and why. Give state examples (see Chronic ALU section in NM's Assessment Protocols). 4) Provide RStudio scripts and procedures to download continuous USGS gage data and use this data to determine data from a particular sampling date is applicable. 	NA	NA			
303(d) program vision topics to be discussed in 2016 IR						

Discuss or clarify further EPA expectations on minimum priorities and interim targets leading up to 2022	Y		Y		
EPA's role regarding state priorities versus EPA's approval of 303(d) list of impaired waters	Y		Y		
Clarify that priority setting should not be based solely or predominately to revise old TMDLs or to remove potentially incorrect listings	Y		Y		
Clarify where priorities/prioritization process should be documented; Clarify that rationale/supporting information should be included	Y		Y		
Discuss "alternatives" - define - factors to aid in selection of TMDLs vs. non-TMDL alternative plan	Y		Y		
Discuss "protection" - define	Y		Y		
Clarify how much engagement of the public is expected for the prioritization process	Y		Y		
Increased focus on assessment goal by more coordination with monitoring program	Y		Y		